



AIR POLLUTION CONTROL DISTRICT OF JEFFERSON COUNTY, KENTUCKY
TITLE V OPERATING PERMIT

Permit No.: 149-97-TV

Co/Plant ID: 0532

Effective Date: 10 October 2000

Expiration Date: 10 October 2005

UTM Northing: 4222.0

UTM Easting: 612.0

SIC: 4953

NAICS: 562212

AFS: 00532

Permission is hereby given by the Air Pollution Control District of Jefferson County to operate equipment located at:

**Outer Loop Recycling and Disposal Facility/WMK-Louisville Hauling
2673 Outer Loop / 7501 Grade Lane
Louisville, Kentucky 40219**

in accordance with the permit application on file with the District and under the conditions in the permit. This permit and the authorization to operate the emission units listed shall expire on midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Applicant for Permit: Outer Loop Recycling and Disposal Facility/WMK-Louisville Hauling

Responsible Official: Richard Barr

Title of Responsible Official: Division Manager

Date Application Received: 22 April 1997

Date Application Administratively Complete: 11 June 1997

Date Public Notice Given: 7 May 2000

Reviewing Engineer (89)

Air Pollution Control Officer

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Abbreviations and Acronyms

AC	- Additional Condition
AFS	- AIRS Facility Subsystem
AIRS	- Aerometric Information Retrieval System
APCD	- Air Pollution Control District
ASL	- Adjusted Significant Level
atm	- Atmosphere
BACT	- Best Available Control Technology
Btu	- British Thermal Unit
°C	- Degrees Centigrade
CEMS	- Continuous Emission Monitoring System
CAAA	- Clean Air Act Amendments (15 November 1990)
cf	- Cubic foot
DOE	- District Only Enforceable
°F	- Degrees Fahrenheit
gal	- Gallon
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- hour
lbs	- Pounds
l	- Liter
MACT	- Maximum Achievable Control Technology
m	- Meter
mg	- Milligram
mm	- Millimeter
MM	- Million
MOCS	- Management of Change System
NAICS	- North American Industry Classification System
NSR	- New Source Review
NO _x	- Nitrogen oxides
NSPS	- New Source Performance Standards
PM	- Particulate Matter
PM ₁₀	- Particulate matter less than 10 microns
ppm	- Parts per million
PSD	- Prevention of Significant Deterioration
PMP	- Preventive Maintenance Plan
psia	- Pounds per square inch absolute
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO ₂	- Sulfur dioxide
TAL	- Threshold Ambient Limit

TAP - Toxic Air Pollutant
tpy - Tons per year
VOC - Volatile Organic Compound
UTM - Universal Transverse Mercator

Preamble

Title V of the Clean Air Act Amendments of 1990 required EPA to create an operating permit program for implementation by state or local air permitting authorities. The purposes of this program are (1) to require an affected company to assume full responsibility for demonstrating compliance with applicable regulations; (2) to capture all of the regulatory information pertaining to an affected company in a single document; and (3) to make permits more consistent with each other.

A company is subject to the Title V program if it meets any of several criteria related to the nature or amount of its emissions. The Title V operating permit specifies what the affected company is, how it may operate, what its applicable regulations are, how it will demonstrate compliance, and what is required if compliance is not achieved. In Jefferson County, Kentucky, the Air Pollution Control District (APCDJC) is responsible for issuing Title V permits to affected companies and enforcing local regulations and delegated federal and state regulations. EPA may enforce federal regulations but not "District Only Enforceable Regulations".

Title V offers the public an opportunity to review and comment on a company's draft permit. It is intended to help the public understand the company's compliance responsibility under the Clean Air Act. Additionally, the Title V process provides a mechanism to incorporate new applicable requirements. Such requirements are available to the public for review and comment before they are adopted.

Title V Permit general conditions define requirements which are generally applicable to all Title V companies under the jurisdiction of APCDJC. This avoids repeating these requirements in every section of the company's Title V permit. Company-specific conditions augment the general conditions as necessary; these appear in the sections of the permit addressing individual emission units or emission points.

The general conditions include references to regulatory requirements that may not currently apply to the company, but which provide guidance for potential changes at the company or in the regulations during the life of the permit. Such requirements may become applicable if the company makes certain modifications or a new applicable requirement is adopted.

When the applicability of a section or subpart of a regulation is unclear, a clarifying citation will be made in the company's Title V permit at the emission unit/point level. Comments may also be added at the emission unit/point level to give further clarification or explanation.

The source's Title V permit may include a list of "insignificant activities," which are activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Activities so identified may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply and must be included in the Title V operating permit. No periodic monitoring shall be required for facilities designated as insignificant activities.

General Conditions

1. **Compliance** - The owner or operator shall comply with all applicable requirements and with all terms and conditions of this permit. Any noncompliance shall constitute a violation of the Act, State and District regulations and shall cause the source to be subject to enforcement actions including, but not limited to, the termination, revocation and reissuance, or revision of this permit, or denial of a permit application to renew this permit. Notwithstanding any other provision in the Jefferson County portion of the Kentucky SIP approved by EPA, any credible evidence may be used for the purpose of establishing whether the owner or operator is in compliance with, has violated, or is in violation of any such plan. (Regulation 2.16, sections 4.1.3, 4.1.13.1 and 4.1.13.7)
2. **Compliance Certification** - The owner or operator shall certify, annually or more frequently if required in applicable regulations, compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall meet the requirements of Regulation 2.16, sections 3.5.11 and 4.3.5. The owner or operator shall submit the annual compliance certification directly to the following address as well as to the District, as set forth in Regulation 2.16, section 4.3.5.4:

***US EPA - Region IV
Air Enforcement Branch
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-8960***

3. **Compliance Schedule** - A compliance schedule must meet the requirements of Regulation 2.16, section 3.5.9.5. The owner or operator shall submit a schedule of compliance for each emission unit that is not in compliance with all applicable requirements. A schedule of compliance shall be supplemental to, and shall not condone noncompliance with, the applicable requirements on which it is based. For each schedule of compliance, the owner or operator shall submit certified progress reports at least semi-annually, or at a more frequent period if specified in an applicable requirement or by the District in accordance with Regulation 2.16 section 4.3.4. The progress reports shall contain:
 - a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when activities, milestones, or compliance were achieved.
 - b. An explanation of why dates in the schedule of compliance were not or will not be met, and preventive or corrective measures adopted.
4. **Duty to Supplement or Correct Application** - If the owner or operator fails to submit relevant facts or has submitted incorrect information in the permit application, it shall, upon discovery of the occurrence, promptly submit the supplementary facts or corrected information in accordance with Regulation 2.16, section 3.4.
5. **Emergency Provision**

- a. An emergency shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emission limitations. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - i. An emergency occurred and that the owner or operator can identify the cause of the emergency.
 - ii. The permitted facility was at the time being properly operated.
 - iii. During the period of the emergency the owner or operator expeditiously took all reasonable steps, consistent with safe operating practices, to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.
 - iv. The owner or operator submitted notice meeting the requirements of Regulation 1.07 of the time when emissions limitations were exceeded because of the emergency. This notice must fulfill the requirement of this condition, and must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- b. In an enforcement proceeding, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- c. This condition is in addition to any emergency or upset provision contained in an applicable requirement.

(Regulation 2.16, sections 4.7.1 through 4.7.4)

- 6. **Emission Fees Payment Requirements** - The owner or operator shall pay annual emission fees in accordance with Regulation 2.08. Failure to pay the emissions fees when due shall constitute a violation of District Regulations. Such failure is subject to penalties and an increase in the fee of an additional 5% per month up to a maximum of 25% of the original amount due. In addition, failure to pay emissions fees within 60 days of the due date shall automatically suspend this permit to operate until the fee is paid or a schedule for payment acceptable to the District has been established. (Regulation 2.08, section 1.3)
- 7. **Emission Offset Requirements** - The owner or operator shall comply with the requirements of Regulation 2.04.
- 8. **Enforceability Requirements** - Except for the conditions that are specifically designated as "District Only Enforceable Conditions", all terms and conditions of this permit, including any provisions designed to limit a source's potential to emit, are enforceable by EPA and citizens as specified under the Act. (Regulation 2.16, sections 4.2.1 and 4.2.2)

9. **Enforcement Action Defense**

- a. It shall not be a defense for the owner or operator in an enforcement action that it would have been necessary for the owner or operator to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- b. The owner or operator's failure to halt or reduce activity may be a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operation.

(Regulation 2.16, sections 4.1.13.2 and 4.1.13.3)

10. **Hazardous Air Pollutants and Sources Categories** - The owner or operator shall comply with the applicable requirements of Regulations 5.02 and 5.14.

11. **Information Requests** - The owner or operator shall furnish to the District, within a reasonable time, information requested in writing by the District, to determine whether cause exists for revising, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish, upon request, copies of records required to be kept by this permit. (Regulation 2.16, section 4.1.13.6) If information is submitted to the District under a claim of confidentiality, the source shall submit a copy of the confidential information directly to EPA. (Regulation 2.07, section 10.2)

12. **Insignificant Activities** - The owner or operator shall notify the District in a timely manner of any proposed change to an insignificant activity that would require a permit revision. (Regulation 2.16, section 5)

13. **Inspection and Entry** - Upon presentation of credentials and other documents as required by law, the owner or operator shall allow the District or an authorized representative to perform the following during reasonable hours:

- a. Enter the premises to inspect any emissions-related activity or records required in this permit.
- b. Have access to and copy records required by this permit.
- c. Inspect facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required by this permit.
- d. Sample or monitor substances or parameters to assure compliance with this permit or any applicable requirements.

(Regulation 2.16, section 4.3.2)

14. **Monitoring and Related Record keeping and Reporting Requirements** - The owner or operator shall comply with the requirements of Regulation 2.16, section 4.1.9. The owner

or operator shall submit all required monitoring reports at least once every six months, unless more frequent reporting is required by an applicable requirement. The reporting period shall be January 1st through June 30th and July 1st through December 31st of each calendar year. All reports shall be postmarked by the 60th day following the end of each reporting period. If surrogate operating parameters are monitored and recorded in lieu of emission monitoring, then an exceedance of multiple parameters may be deemed a single violation by the District for enforcement purposes.

15. **Off-permit Documents** - Any applicable requirements, including emission limitations, control technology requirements, or work practice standards, contained in an off-permit document cannot be changed without undergoing the permit revision procedures in Regulation 2.16, Section 5. (Regulation 2.16, section 4.1.5)
16. **Operational Flexibility** - The owner or operator may make changes without permit revision in accordance with Regulation 2.16, section 5.8.
17. **Permit Amendments (Administrative)** - This permit can be administratively amended by the District in accordance with Regulation 2.16, sections 2.3 and 5.4.
18. **Permit Application Submittal** - The owner or operator shall submit a timely and complete application for permit renewal or significant revision. If the owner or operator submits a timely and complete application then the owner or operator's failure to have a permit is not a violation until the District takes formal action on this permit application. This protection shall cease to apply if, subsequent to completeness determination, the owner or operator fails to submit, by the deadline specified in writing by the District, additional information required to process the application as required by Regulation 2.16, sections 3 and 5.2.
19. **Permit Duration** - This permit is issued for a fixed term of 5 years, in accordance with Regulation 2.16, section 4.1.8.3.
20. **Permit Renewal, Expiration and Application** - Permit renewal, expiration and application procedural requirements shall be in accordance with Regulation 2.16, sections 4.1.8.2 and 5.3. This permit may only be renewed in accordance with section 5.3.
21. **Permit Revisions** - No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. (Regulation 2.16, section 4.1.16)
22. **Permit Revision Procedures (Minor)** - Except as provided in 40 CFR Part 72, the Acid Rain Program, this permit may be revised in accordance with Regulation 2.16, section 5.5.
23. **Permit Revision Procedures (Significant)** - A source seeking to make a significant permit revision shall meet all the Title V requirements for permit applications, issuance and renewal, in accordance with Regulation 2.16, section 5.7, and all other applicable District Regulations.

24. **Permit Revocation and Termination by the District** - The District may terminate this permit only upon written request of the owner or operator. The District may revoke a permit for cause, in accordance with Regulation 2.16, section 5.11.1.1 through 5.11.1.5. For purposes of Section 5, substantial or unresolved noncompliance includes, but is not limited to:
- a. Knowingly operating process or air pollution control equipment in a manner not allowed by an applicable requirement or that results in excess emissions of a regulated air pollutant that would endanger the public or the environment.
 - b. Failure or neglect to furnish information, analyses, plans, or specifications required by the District.
 - c. Knowingly making any false statement in any permit application.
 - d. Noncompliance with Regulation 1.07, section 4.2; or
 - e. Noncompliance with KRS Chapter 77.
25. **Permit Shield** - The permit shield shall apply in accordance with Regulation 2.16, section 4.6.1.
26. **Prevention of Significant Deterioration of Air Quality** - The owner or operator shall comply with the requirements of Regulation 2.05.
27. **Property Rights** - This permit shall not convey property rights of any sort or grant exclusive privileges in accordance with Regulation 2.16, section 4.1.13.5.
28. **Public Participation** - Except for modifications qualifying for administrative permit amendments or minor permit revision procedures, all permit proceedings shall meet the requirements of Regulations 2.07, Section 1; and 2.16, sections 5.1.1.2 and 5.5.4.
29. **Reopening For Cause** - This permit shall be reopened and revised by the District in accordance with Regulation 2.16 section 5.9.
30. **Reopening for Cause by EPA** - This permit may be revised, revoked and reissued or terminated for cause by EPA in accordance with Regulation 2.16 section 5.10.
31. **Risk Management Plan (112(r))** - For each process subject to Section 112(r) of the Act, the owner or operator shall comply with 40 CFR Part 68 and Regulation 5.15.
32. **Severability Clause** - The conditions of this permit are severable. Therefore, if any condition of this permit, or the application of any condition of this permit to any specific circumstance, is determined to be invalid, the application of the condition in question to other circumstances, as well as the remainder of this permit's conditions, shall not be affected. (Regulation 2.16, section 4.1.12)

33. **Stack Height Considerations** - The owner or operator shall comply with the requirements of Regulation 2.10.
34. **Startups, Shutdowns, and Malfunctions Requirements** - The owner or operator shall comply with the requirements of Regulation 1.07.
35. **Submittal of Reports, Data, Notifications, and Applications**
- a. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit as set forth in Regulation 2.16 sections 3.1, 3.4, 3.5, 4.1.13.6, 5.8.5 and 5.11.7 shall be submitted to:
- Air Pollution Control District of Jefferson County
850 Barret Ave
Louisville, KY 40204-1745***
- b. Documents which are specifically required to be submitted to EPA as set forth in Regulation 2.16 sections 3.3, and 5.8.5 shall be mailed to EPA at the following address:
- US EPA - Region IV
APTMD - 12th floor
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-3104***
36. **Other Applicable Regulations** - The owner or operator shall comply with all applicable requirements of the following regulations:

FEDERALLY ENFORCEABLE REGULATIONS	
Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emission Standards and Maintenance Requirements
1.06	Source Self-Monitoring and Reporting
1.07	Emissions During Startups, Shutdowns, Malfunctions, and Emergencies
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning

FEDERALLY ENFORCEABLE REGULATIONS	
Regulation	Title
1.14	Control of Fugitive Particulate Emissions
2.01	General Application
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Permit Requirements - Non-Title V Construction and Operating Permits and Demolition/Renovation Permits
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.16	Title V Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
5.01	General Provisions (for Hazardous Air Pollutants)
5.03	Potential Hazardous Emissions
6.01	General Provisions (for <i>Existing Affected Facilities</i>)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (for <i>New Affected Facilities</i>)

DISTRICT ONLY ENFORCEABLE REGULATIONS	
Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Emissions Fees, Permit Fees, Permit Renewal Procedures, and Additional Program Fees
8.03	Commuter Vehicle Testing Requirements

EMISSION UNIT U1 DESCRIPTION: Municipal Solid Waste Landfill (MSWL)

APPLICABLE REGULATIONS:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
6.45	Standards of Performance for Existing Solid Waste Landfills	1, 2, 3.1.2, 3.1.3, 4, 5
40 CFR 60, subpart WWW	Standards of Performance for Municipal Solid Waste Landfills	60.750 through 60.759
40 CFR 61, subpart M	National Emission Standard for Asbestos	61.141 and 61.154 (c), (d) and (e)

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.02	Federal Emission Standards for Hazardous Air Pollutants Incorporated by Reference	1, 2, 3, 4
7.02	Federal New Source Performance Standards Incorporated by Reference	1, 2, 4
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1 through 3
5.14	Hazardous Air Pollutants and Source Categories	1, 2

ALLOWABLE EMISSIONS:

Pollutant	Limit/Standard
TAPs	< ASL, Regulation 5.12, sec. 5

Control devices:

C1 - Open flare #1, stack S1
C2 - Open flare #2, stack S2

ADDITIONAL CONDITIONS

- Monitoring** (Regulation 2.16, section 4.1.9.1.2 & 40 CFR 60, Subpart WWW)

CATEGORY	MONITORING ACTION	SCHEDULE	REFERENCE
Gas Collection System	Monitor gauge pressure within each gas extraction well. A negative value indicates a well is operating with a sufficient gas extraction rate.	Monthly	§60.756(a)(1)
	Monitor nitrogen concentration using Method 3C or oxygen concentration using Method 3A or 3C. Nitrogen concentration values <20% or oxygen concentration values <5% indicate well extraction rates are not causing excessive air infiltration into the landfill.	Monthly	§60.756(a)(2)
	Monitor Landfill gas temperature in extraction wells; should be <55°C(131°F), unless otherwise demonstrated that a higher temperature is appropriate. Adjustments shall be made to well to meet this performance criteria to prevent aerobic conditions within the landfill and/or subsurface fires.	Monthly	§60.756(a)(3)
	Monitor methane concentration at the landfill surface. Values <500 ppm above background indicate well extraction rates are sufficient to minimize the amount of LFG seeping out of the landfill.	Quarterly while landfill is active. Annual if no exceedances for 3 consecutive quarters in closed areas.	§60.755(c) §60.756(f)
	Monitor cover integrity. Cover repairs must be implemented as necessary.	Monthly	§60.755(c)(5)
Gas Control System	Monitor gas flow from collection system to open flare. This requirement identifies periods when gas flow has been diverted from the control device	At least once every 15 minutes. (If flare is used other than backup)	§60.756(c)(2)
	Monitor the continuous presence of a pilot flame or the flare flame for an open flare. This requirement confirms operation status of control device.	Continuous (If flare is used other than backup)	§60.756(c)(1)
	Monitor the gas flow rate to or bypass of the control device.	Monthly	§60.756(b)(2)(I)
	Secure the bypass line valve in the closed position with a car-seal or a lock-and-key configuration and perform a visual inspection of the seal or closure mechanism to ensure that the valve is closed and gas is not being by passed.	Monthly	§60.756(b)(2)(ii)

a. **Surface Monitoring Procedure**

The owner or operator shall perform surface monitoring pursuant to 40 CFR 60.755(c)(1) except for the following:

- i. Areas which are approved for exclusion from monitoring include:
 - 1) Active areas are those areas which only have daily cover. Active areas of the landfill have a larger volume of equipment traffic which poses an unacceptable health and safety risk to an individual in the area.

However, active areas where MSW is being placed over 5 year old MSW and where a gas collection and control system has been installed may not be excluded from surface methane monitoring unless the area to be monitored has been disturbed due to maintenance and poses a potential safety hazard. Monitoring shall commence once again on this area when the potential safety hazard has been eliminated or corrected.
 - 2) The portion of Area 4 which is receiving construction and demolition waste only.
 - 3) Areas of the landfill with slopes equal to or greater than 3:1 (horizontal to vertical). These steep slopes present a safety hazard to the monitoring technician traversing them.
 - 4) Areas with snow cover. The snow makes these areas difficult to traverse and a slipping hazard for the monitoring personnel.
 - 5) Icy slopes. These present a health and safety concern to the monitoring personnel.
- ii. Areas which are approved to have alternative spacing includes are Areas 5 and 7. A spacing of 90 meters is proposed for the interval spacing during the scan, due to the synthetic cover that will be placed over these sites at final closure. The synthetic cover is expected to provide an excellent barrier to emissions; therefore, a greater spacing between the passes is requested. Should an exceedance of 500 ppm or more be noted, the interval will be reduced back to 30 meters until three consecutive monitoring events without an exceedance can be demonstrated. At this time, the site will return to a 90 meter interval.

b. Surface Monitoring Frequency

Surface monitoring shall occur on a quarterly basis except for when temperature conditions are outside the operating range of the instrument and/or other conditions (snow cover, rain storms, etc.) prevent monitoring. The monitoring event shall be rescheduled as soon as practicable after the original scheduled date.

c. **Surface Monitoring Instrument**

The monitoring shall be conducted with an organic vapor analyzer; flame ionization detector; or other portable monitor meeting the specifications in 40 CFR Part 60 (Method 21), except "methane" shall replace all references to VOC.

d. **Surface Monitoring Survey**

Immediately before commencing a surface monitoring survey, the instrument shall be calibrated per section 4.2 of Method 21. The calibration gas shall be methane, diluted to a nominal concentration of 500 parts per million in air. Calibrations will be documented in an instrument logbook or on the form shown in Table III-2 in Landfill Gas Collection and Control System Design Plan, dated 12/15/1997. (See comments)

The background concentration at the facility shall be determined immediately prior to conducting the survey. The background concentration shall be determined by moving the probe inlet upwind of the boundary of the landfill and at least 30 meters from outside the perimeter wells. The background concentration, measurement location, and basic meteorological conditions will be recorded in Table III-2 in Landfill Gas Collection and Control System Design Plan. Other factors that can affect background shall be noted and accounted for (such as a nearby landfill, highway, refinery, chemical plant, etc).

Surface emission monitoring shall be performed in accordance with section 4.3.1 of Method 21, except the probe inlet shall be placed within 5 to 10 centimeters of the ground and the probe moved continuously along the ground. Monitoring will not be performed during extreme meteorological conditions.

Surface monitoring shall be conducted around the perimeter of the collection area and the route shown on the topographic map. Areas where visual observations indicate elevated concentrations of landfill gas, such as distressed vegetation and cracks or seeps in the cover, will be monitored.

Any reading of 500 parts per million or more above background at any location shall be recorded as a monitored exceedance and the following actions shall be taken:

- i. The location of each monitored exceedance shall be marked and the location recorded. Table III-3 in Landfill Gas Collection and Control System Design Plan is a form for documenting monitoring exceedances.
- ii. Cover maintenance or adjustments to the vacuum of the adjacent wells to increase the gas collection in the vicinity of each exceedance shall be made and the location shall be re-monitored within 10 calendar days of detecting the exceedance.
- iii. If the re-monitoring of the location shows a second exceedance, additional corrective action shall be taken and the location shall be monitored again within 10 days of the second exceedance. If the re-monitoring shows a third

exceedance for the same location, the action specified in paragraph 4 below shall be taken, and no further monitoring of that location is required until the action specified in paragraph 4 has been taken.

- iv. Any location that initially showed an exceedance but has a methane concentration less than 500 ppm methane above background at the 10-day re-monitoring specified in paragraph iii of this section shall be re-monitored one month from the initial exceedance. If the one month re-monitoring shows a concentration less than 500 parts per million above background, no further monitoring of that location is required until the next quarterly monitoring period. If the one-month re-monitoring shows an exceedance, the actions specified in paragraph 5 shall be taken.
- v. For any location where the monitored methane concentration equals or exceeds 500 parts per million above background three consecutive times within a quarterly period, a new well or other collection device shall be installed within 120 calendar days of the initial exceedance. An alternative remedy to the exceedance, such as upgrading the blower, header pipes or control device, and a corresponding time line for installation may be submitted to the District or for approval. In addition, the Air Pollution Control District of Jefferson County will be notified within five (5) working days of any third consecutive surface monitoring exceedance in a particular location.

e. **Reduced Monitoring Frequency for Closed Landfills**

Any closed landfill that has no monitored exceedances of the 500 ppm limit above background in three consecutive quarterly monitoring periods may skip to annual monitoring. Any methane reading of 500 ppm or more above background detected during the annual monitoring returns the frequency to quarterly monitoring. This would be applicable to Areas 1, 2, 3, 6 and the portion of Area 4 that is not actively receiving construction and demolition waste.

f. **Cover Integrity Monitoring**

40 CFR 60.755(b)(5) requires a program to monitor for cover integrity and implement cover repairs as necessary on a monthly basis.

On a monthly basis facility personnel shall conduct a site walk of the landfill to inspect the cover. The inspector shall look for signs of compromised cover integrity such as stressed vegetation, cracks, and erosion. The monthly inspection shall be documented on the form in Table III-4 of the proposal in the Landfill Gas Collection and Control System Design Plan. Areas of compromised integrity shall be noted on the inspection form. The appropriate facility personnel shall be notified of the compromised areas so appropriate action can be taken.

2. **Record Keeping** (Regulation 2.16, section 4.1.9.2 & 40 CFR 60, Subpart WWW)

Record keeping requirements for MSW landfills subject to the NSPS are contained in 40 CFR 60.758. Records must be stored on-site and be readily accessible. Off-site storage of records is allowable if the records can be retrieved within four hours. Per 40 CFR 60.758(e), readily accessible records of each surface monitoring exceedance shall be kept for at least five years. These records shall include the location and reading of the exceedance, as well as the results of the follow-up readings in the subsequent months (whether or not these follow-up readings were exceedances).

The record keeping activities shall include the following:

AREA	RECORD KEEPING ITEM	REFERENCE
Landfill Information	Current maximum design capacity, current amount of refuse in place and year-by year refuse acceptance rates.	§60.758(a)
Collection System Design	Plot map showing each existing and planned well in the gas collection system. Provide unique identifying labels for each well.	§60.758(d)
	Installation date and location of all newly installed wells per §60.755(b).	§60.758(d)(1)
	Description, location, amount, and placement date of all non-degradable refuse including asbestos and demolition refuse placed in landfill areas which are excluded from LFG collection and control (unless the landfill does not choose to exclude any areas from control).	§60.758(d)(2)
	Demonstration of "sufficient" density of wells, horizontal collectors or other gas extraction devices.	§60.758(b)(1)(I)
Control System Design	Maintain records of control device vendor specifications until the control equipment is removed.	§60.758(b)
Initial Performance Test Measurements	1. For open flares not used as backup: 2. Type of flare (steam-, air-, or non-assisted) 3. All visible emission readings made during performance test 4. Heat content determination made during performance test 5. Gas flow rate or bypass measurements 6. Exit velocity determinations made during performance test 7. Continuous pilot flame or flare flame monitoring All periods when pilot flames or flare flame is absent	§60.758(b)(4)

AREA	RECORD KEEPING ITEM	REFERENCE
Routine System Monitoring Parameters	1. Record the following: 2. Gauge pressure in each extraction well (monthly) 3. Nitrogen or oxygen concentration in extracted LFG (monthly) 4. Temperature of extracted LFG (monthly) 5. Methane concentrations along landfill surface (quarterly) 6. Gas flow from collection system to the control device every 15 minutes 7. Continuous presence of a flame In lieu of keeping records for monitoring the continuous presence of a flame, the owner or operator shall review records of flow on a monthly basis. Those periods of time which correspond to zero flow for more than one hour will be included in the semi-annual reports.	§60.758(c) §60.758(c)(4)
Gas Collection System Exceedances	Record all values which exceed the operation standards specified in §60.753. For the quarterly surface scan, include the reading from the subsequent month, whether or not the second reading is exceedance, and the location of each exceedance.	§60.758(c)
Gas Control System Exceedances	Record all periods of operation in which the flare flame is out (see attached proposal for alternative record keeping).	§60.758(c)(4)

3. Reporting (Regulation 2.16, section 4.1.9.3 & 40 CFR 60, Subpart WWW)

REPORT/ACTION	SCHEDULE	REFERENCE
Initial Design Capacity Report	For Outer Loop RDF, this report was submitted May 30, 1996.	§60.757(a)
Annual NMOC Emission Rate Report (Tier 1)	For Outer Loop RDF, this report was submitted May 30, 1996. Repeat once a year until a gas collection/control system has been installed. Owner is exempted from submitting reports while system is operational.	§60.757(b)
Collection and Control System Design Plan	Submit within 1 year after NMOC Emission Rate Report has a value > 50 Mg/yr. For Outer Loop RDF, this report was submitted May 30, 1997.	§60.752(b)(2)(I)

REPORT/ACTION	SCHEDULE	REFERENCE
Initial Control System Performance Test Report	<p>Submit within 180 days of emission collection and control system start up per §60.8. Results can be included in the initial Annual report. Report shall include:</p> <ol style="list-style-type: none"> Diagram of collection system showing location of all wells, horizontal collectors, etc. and any areas excluded from control. Data upon which "sufficient density" of wells, horizontal collectors, and gas mover equipment sizing are based. Provisions for the control of off-site migration. Information on the open flare, including: <ol style="list-style-type: none"> Flare type Visible emission readings Heat content determination Flow rate measurements Exit velocity determination 	§60.757(g)
Annual Compliance Report	<p>Submit initial report within 180 days of emission collection and control system start up. Report is due annually thereafter. Report shall include:</p> <ol style="list-style-type: none"> Valve and length of time for exceedance of applicable parameters monitored under §60.756(a), (b), (c), and (d), (i.e., temperature, O₂ or N₂ concentrations in each well, instances when positive pressure occurs at a well head in efforts to avoid a fire). Description and duration of all periods when the control device was not operating for a period exceeding one hour, and length of time the control device was not operating (see attached proposal for alternative reporting). All periods when the collection system was not operating in excess of five days. Location of each exceedance of the 500 ppm methane concentration during the surface scan, and the concentration recorded at each location for which an exceedance was recorded the previous month. Date of installation and the location of each well or collection system expansion added pursuant to paragraphs (a)(3), (b) and (c)(4) of §60.755. 	§60.757(f)
Control Equipment Removal Report	<p>Submit report within 30 days prior to removal or cessation of control system operations. Controls can be removed after meeting all of these criteria:</p> <ol style="list-style-type: none"> Landfill Closure Report has been submitted Control systems were operated for at least 15 years Three consecutive NMOC Emission Rate Reports with values <50 Mg/yr achieved 	§60.757(c)
Closure Report	Submit a closure report to the administrator within 30 days of waste acceptance cessation.	§60.757(d)

4. Asbestos Containing Material (Regulation 40 CFR 61, sec.154(c))

When actively receiving asbestos containing material, for disposal, the owner or operator shall, at the end of each operating day, or at least once every 24-hour period while the site is in continuous operation, the asbestos-containing waste material that has been deposited at the site during the operating day or previous 24-hour period shall:

- a. Be covered with at least 15 centimeters (6 inches) of compacted non asbestos-containing material, or
- b. Be covered with a resinous or petroleum-based dust suppression agent that effectively binds dust and controls wind erosion. Such an agent shall be used in the manner and frequency recommended for the particular dust by the dust suppression agent manufacturer to achieve and maintain dust control. Other equally effective dust suppression agents may be used upon prior approval by the District. For purposes of this paragraph, any used, spent, or other waste oil is not considered a dust suppression agent.

5. TAPs (Regulation 5.12)

The owner or operator has demonstrated that the uncontrolled potential emissions of Toxic Air Pollutants do not exceed the calculated Adjusted Significance Level, pursuant to Regulation 5.12; therefore, the owner or operator is not required to maintain records to show continued compliance with this regulation.

Comments

1. Per 40 CFR 60.752(b)(2)(I)(B), the design plan shall include proposed alternatives to the monitoring, record keeping and reporting requirements outlined in the NSPS. The Additional Conditions summarized exemptions and alternatives proposed in the submittal.

As of December 1, 1997, the following requested alternatives as proposed in Landfill Gas Collection and Control System Design Plan have been approved by the Air Pollution Control District of Jefferson County:

Section 60.753(a)(1) Operational Standards for Collection and Control Systems:

"Operate the collection system such that gas is collected from each area, cell ,
or group of cells in the landfill in which solid waste has been in place for:

1. 5 years or more if active
2. 2 years or more if closed or at final grade

Outer Loop RDF is proposing to only install wells once final grades are reached and the site has been active for 5 years or more or closed or at final grade for 2 years or more. For cells that have been active for 5 years or more and are not yet to final grades, the leachate collection system or other temporary methods may be used for gas extraction until the wells can be installed (i.e. final grades have been reached).

2. Additional conditions 1.a through 1.f obtain their authority from the approval of the Landfill Gas Collection and Control System Design Plan.
3. Because the company submitted the required Landfill Gas Collection and Control System Design Plan and the requirements contained therein are more stringent than what was required under Regulation 6.45, the company shall have no further requirements to comply with, under Regulation 6.45.
4. Emission Unit, U1:
 - a. Should the owner or operator exceed certain criteria specified in 40 CFR 60, subpart WWW or in the approved variances defined in the Collection and Control System Design Plan and are denoted in either that the exceedance is not to be considered a compliance issue, no violation will be issued.
 - b. Should a discrepancy arise between monitoring, record keeping and reporting requirements specified in this permit and 40 CFR 60, subpart WWW or the Collection and Control System Design Plan, the approved alternate or permit shall prevail.
5. Subpart WWW makes no allowance for excluding active areas from surface monitoring where new municipal solid waste (MSW) is placed over 5 year old MSW with a gas collection and control system installed. Therefore, surface methane monitoring should be done in all active areas of this Emission Unit, where the gas collection and control system is required to be installed and operated under the subpart WWW. Therefore, surface methane monitoring should include active areas where MSW has been placed over 5 year old MSW. However, areas of the landfill which are disturbed due to maintenance pose a potential safety hazard during surface monitoring and may be excluded from monitoring until which time it has been determined to no longer pose an occupational hazard.

EMISSION UNIT U2 DESCRIPTION: Leachate Pre-treatment**APPLICABLE REGULATIONS:**

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

ALLOWABLE EMISSIONS:

Pollutant	Limit/Standard
TAPs	< ASL, Regulation 5.12, Section 5

COMPONENTS:

E4 - Sequential batch reactor pre-treatment facility

ADDITIONAL CONDITIONS**1. Standards** (Regulation 5.12, Section 5)

The owner or operator shall limit Toxic Air Pollutant (TAP) emissions from this source to below the calculated ASL specified in District Regulation 5.12, unless modeling or a BACT determination has been performed and approved by the District.

2. Monitoring (Regulation 2.16, section 4.1.2.1.9)

See additional condition 3.

3. Record Keeping (Regulation 2.16, section 4.1.9.2)

The owner or operator shall maintain monthly records of leachate throughput at this facility. The owner or operator has demonstrated hourly compliance with Regulations 5.12 based on a one time engineering calculation for the leachate pre-treatment. The owner or operator shall make these records available to the District upon request.

3. Reporting (Regulation 2.16, section 4.1.9.3)

No compliance reports are required.

EMISSION UNIT U3 DESCRIPTION: Bioremediation of Contaminated Soil

APPLICABLE REGULATIONS:

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1, 2.1, 3, 4

ALLOWABLE EMISSIONS:

Pollutant	Limit/Standard
VOC	< 5 TPY, Regulation 7.25, sec. 2.1
TAPs	< ASL, Regulation 5.12, Section 5

COMPONENTS:

E5 - Bioremediation soil piles

ADDITIONAL CONDITIONS

1. Standards (Regulation 2.16, section 4.1.1)

a. **VOC** (Regulation 7.25, section 2.1)

The owner or operator shall not allow the total VOC emissions equal or to exceed 5 tons per year

b. **TAPs** (Regulation 5.12, Section 5)

The owner or operator shall limit Toxic Air Pollutant (TAP) emissions from this source to the emission rate(s) below the calculated ASL specified in Regulation 5.12, unless modeling or a BACT determination has been performed and approved by the District.

2. Monitoring (Regulation 2.16, sec 4.1.9.1.2)

a. **VOC**

- i. The owner or operator shall annually collect random samples from the material storage piles to be remediated and test for the total petroleum hydrocarbon concentration.
- ii. The owner or operator shall calculate the amount of VOC emitted to the ambient air based on the quantity of soil involved and the tested VOC content of the soil as represented in the table (on an annual basis):

Annual Tonnages of Soil Processes	Total Petroleum Hydrocarbon Concentration (TPH) (in Parts Per Million)
1,000	25,000
5,000	5,000
10,000	2,500
15,000	1,667
20,000	1,250
25,000	1,000
30,000	833
35,000	714
40,000	625

45,000	556
50,000	500
100,000	250
200,000	125
300,000	83
400,000	63
500,000	50

b. **TAP**

Monitor by maintaining records of TAP emissions based on:

- i. the hours of operation;
- ii. TAPs being emitted;
- iii. amount of TAPs contained in the contaminated soil; and
- iv. emission rates to demonstrate hourly compliance with Regulation 5.12.

3. Record Keeping (Regulation 2.16, section 4.1.9.2)

a. **VOC**

The owner or operator shall maintain records of:

- i. amount of contaminated soil stored, including additions on a monthly basis
- ii. the annually tested TPH content of the contaminated soil

b. **TAP**

The owner or operator shall maintain records of:

- i. amount of contaminated soil stored, including additions on a monthly basis
- ii. TAP (BTEX) content of the contaminated soil
- iii. calculated hourly TAP emission rates based on monthly records

4. Reporting (Regulation 2.16, section 4.1.9.3)

a. **VOC**

The owner or operator shall report, semi-annually, the total VOC emissions from this emission unit. The owner or operator shall include, at a minimum, the following information

in the semi-annual compliance reports to demonstrate ongoing compliance with the 5 TPY VOC limit.

- i. Emission Unit/Point ID Number
- ii. The beginning and ending date of the reporting period
- iii. The monthly and year to date total of VOC emissions
- iv. Identification of all periods of exceedances of the VOC 5 ton per year limit including the quantity of excess emissions
- v. Corrective measures taken, should 4, above have occurred.

b. **TAP**

No compliance reporting is required.

EMISSION UNITS U4 and U8 DESCRIPTIONS:

1,000 and 8,000 gallon capacity above ground, unleaded gasoline storage tanks

APPLICABLE REGULATIONS:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.15	Standards of Performance for Gasoline Transfer To New Service Station Storage Tanks (Stage 1 Vapor Recovery)	1,2, 3.1, 3.3, 3.8, 4, 5, 6

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

ALLOWABLE EMISSIONS:

Pollutant	Limit/Standard
VOC	See Additional Conditions 1, 2, and 3

COMPONENTS:

Emission Unit U4: E6 - 1000 gallon gasoline storage tank with vent (stack S3), installed in October 1991.

Emission Unit U8: E10 - 8000 gallon gasoline storage tank with vent (stack S5), installed in November 1987.

ADDITIONAL CONDITIONS

1. Standards (Regulation 7.15)

- a. The owner or operator shall install, maintain and operate the storage tank with a submerged fill pipe, a vapor balance system and vapor tight connections on the liquid fill and vapor return hoses. (Reg. 7.15, sec. 3.1.1 and 3.14)
- b. The owner or operator shall equip all fill tubes with vapor-tight covers including gaskets. (Reg.7.15, sec. 3.8.1)
- c. The owner or operator shall maintain all hoses, fittings, and couplings in a vapor-tight condition. (Reg. 7.15, sec. 3.8.5)

2. Monitoring (Regulation 2.16, section 4.1.9.1.2)

The owner or operator shall perform a monthly inspection of this facility to assure that gaskets, hoses and couplings are maintaining their vapor tight characteristics.

3. Record Keeping (Regulation 2.16, section 4.1.9.2)

The owner or operator shall maintain records of the monthly inspections performed. These records shall include:

- a. Date of inspection
- b. Name of who performed the inspection
- c. Findings of the inspection
- d. Date of any remedial action
- e. Description of the remedial action taken

4. Reporting (Regulation 2.16, section 4.1.9.3)

The owner or operator shall report, semi-annually, at a minimum, the following information:

- a. Emission Unit/Point ID Number
- b. The beginning and ending date of the reporting period
- c. Remedial measures taken, should 3.e have an entry during the reporting period.

EMISSION UNIT U5 DESCRIPTION: Liquid solidification process

APPLICABLE REGULATIONS:

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.08	Standards of Performance for New Process Operations	1, 2, 3.1

COMPONENTS:

E7 - Solidification mixing area

ADDITIONAL CONDITION**1. Standards** (Regualtion 7.08, section 3.1)

The owner or operator shall not allow or cause the opacity from this emission unit to meet or exceed 20%

2. Monitoring (Regulation 2.16, sec.4.1.9.1.2)

The owner or operator shall, to demonstrate compliance with the opacity standard:

- a. Conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours. No more than four Emission Points shall be observed simultaneously. The survey shall be conducted at that point, at the edge of the work pad of this process and on the down wind side.
- b. For Emission Points without observed visible emissions during twelve consecutive weeks, the owner or operator may elect to conduct a monthly one-minute visible emission survey, during normal operation and daylight hours. No more than four Emission Points shall be observed simultaneously.
- c. At Emission Points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 22 for fugitive emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07, and take all practicable steps to eliminate the exceedance.
- d. Subsequent visible emission surveys shall be conducted as indicated in item 2.a.

3. Record Keeping (Regulation 2.16, section 4.1.9.2)

Records of the results of all visible emission surveys and tests performed shall be maintained and shall include the date and time of the survey; the name of the person conducting the survey; and whether visible emissions were observed. If an Emission Point is not being operated during a given week (or month, as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.

4. Reporting (Regulation 2.16, section 4.1.9.3)

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:

- a. Emission Unit ID number and Stack ID number
- b. The beginning and ending date of the reporting period
- c. The date, time, and results of each Method 22 conducted (or a negative declaration if none)
- d. Description of any corrective action taken pursuant to Additional Condition 2.c

EMISSION UNIT U7 DESCRIPTION: Spray paint booth for painting of trash containers

APPLICABLE REGULATIONS:

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.08	Standards of Performance for New Process Operations	1, 2, 3.1
7.59	Standards of Performance for New Miscellaneous Metal Parts and Products	1, 2, 3, 4, 5.2, 6

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
5.12	Standards of Performance for New or Modified Sources Emitting Toxic Air Pollutants	1 through 5
5.14	Hazardous Air Pollutants and Source Categories	1 and 2

ALLOWABLE EMISSIONS:

Pollutant	Limit/Standard
Opacity	20 %, Regulation 7.08, sec. 3.1.1
PM	2.34 lb/hr, Regulation 7.08, sec. 3.1
VOC	< 5 TPY, Regulation 7.59, sec. 5.2
TAPs	< ASL, Regulation 5.12, sec. 5

COMPONENT:

E9 - Paint booth which emits from stack S4

ADDITIONAL CONDITIONS**1. Standards** (Regulation 2.16, section 4.1.1)**a. Opacity**

The owner or operator shall, for each particulate matter (PM) Emission Point subject to 7.08 (section 3.1.1), not cause or permit the discharge of emissions in excess of 20% opacity.

b. PM

The owner or operator shall, for each particulate matter (PM) Emission Point subject to 7.08 (section 3.1), not cause or permit the discharge of emissions in excess of 2.34 lb/hr.

c. VOC

The owner or operator shall not allow or cause the VOC emissions to exceed 5 TPY VOC, (Reg.7.59, sec.5.2)

d. TAPs

Limit Toxic Air Pollutant (TAP) emissions from this source to the emission rate(s) below the calculated ASL specified in Regulation 5.12, unless modeling or a BACT determination has been preformed and approved by the District.

2. Monitoring (Regulation 2.16, section 4.1.9.1.2)**a. Opacity**

i. The owner or operator shall, to demonstrate compliance with the opacity standard, conduct a weekly one-minute visible emissions survey, during normal operation and daylight hours, of the PM Emission Points (stacks) identified in U-7.

ii. For Emission Points without observed visible emissions during twelve consecutive operating weeks, the owner or operator may elect to conduct a monthly one-minute visible emission survey, during normal operation and daylight hours.

iii. At Emission Points where visible emissions are observed, the owner or operator shall Initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9 for stack emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07, and take all practicable steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in item 2.a.i.

b. **PM**

The owner or operator shall calculate, monthly, the amount of particulate emitted, on an hourly basis, to the ambient air, based on: amount and solids content of each coating used; over spray per AP 40; hours of operation; and the collection efficiency of the filtration devices used to control emissions.

c. **VOC**

The owner or operator shall calculate the amount of VOC emitted to the ambient air, based on the quantity and VOC content (excluding water and exempt solvents) of each coating, thinner, reducer or any other VOC containing material used during each calendar month. (Reg.2.16, sec.4.1.9.1.2)

d. **TAPs**

The owner or operator shall review TAP constituents in all coating used. The owner or operator shall calculate TAP emissions, based on these constituents and hours of operation.

3. Record Keeping (Regulation 2.16, section 4.1.9.2)

a. **Opacity**

Records of the results of all visible emission surveys and tests performed shall be maintained and shall include the date and time of the survey; the name of the person conducting the survey; and whether visible emissions were observed. If an Emission Point is not being operated during a given week (or month, as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.

b. **PM**

The owner or operator shall keep monthly records, of all coating used, types of materials coated and hours of operation.

c. **VOC**

Keep monthly records of all coatings used.

d. **TAPs**

Maintain monthly records of TAP emissions based on the hours of operation and material emission rates to demonstrate hourly compliance with Regulation 5.12; and make these records available to the District upon request.

4. Reporting (Regulation 2.16, section 4.1.9.3)

a. **Opacity**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:

- i. Emission Unit ID number and Stack ID number
- ii. The beginning and ending date of the reporting period
- iii. The date, time, and results of each Method 9 conducted (or a negative declaration If none)
- iv. Description of any corrective action taken pursuant to Additional Condition 1.a.iii.

b. **PM**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for PM:

- i. Emission Unit ID Number
- ii. The beginning and ending date of the reporting period
- iii. The monthly and year to date total particulate emissions
- iv. Identification of all periods of exceedances of the standards including the quantity of excess emissions
- v. Description of any corrective action taken pursuant to 4.b.iv.

c. **VOC**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for VOC

- i. Emission Unit ID Number
- ii. The beginning and ending date of the reporting period
- iii. The monthly and year to date total VOC emissions
- iv. Identification of all periods of exceedances of the coating VOC 5 tons limit including the quantity of excess emissions
- v. Description of any corrective action taken pursuant to 4.c.4.

d. **TAPs**

No compliance reporting is required.

EMISSION UNIT U9 DESCRIPTION: Sandblasting operation

APPLICABLE REGULATION

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.08	Standards of Performance for New Process Operations	1, 2, 3.1

ALLOWABLE EMISSIONS:

Pollutant	Limit/Standard
Opacity	20 %, Regulation 7.08, sec. 3.1.1
PM	2.34 lb/hr, Regulation 7.08, sec. 3.1

COMPONENT:

E11 - Sandblasting area

ADDITIONAL CONDITIONS**1. Standards** (Regulation 7.08)a. **Opacity**

The owner or operator shall, for each particulate matter (PM) Emission Point subject to 7.08 (section 3.1.1), not cause or permit the discharge of emissions in excess of 20% opacity.

b. **PM**

The owner or operator shall, for each particulate matter (PM) Emission Point subject to 7.08 (section 3.1), not cause or permit the discharge of emissions in excess of 2.34 lb/hr.

2. Monitoring (Regulation 2.16, section 4.1.9.1.2)a. **Opacity**

- i. The owner or operator shall, only when this process is being operated, demonstrate compliance with the opacity standard by conducting a weekly one-minute visible emissions survey, during normal operation and daylight hours, of the PM Emission Point identified in U-9.
- ii. For Emission Points without observed visible emissions during twelve consecutive weeks, the owner or operator may elect to conduct a monthly one-minute visible emission survey, during normal operation and daylight hours.
- iii. At Emission Points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 22 for stack emissions within 24 hours of the initial observation. If the opacity standard is exceeded, the owner or operator shall report the exceedance to the District, pursuant to Regulation 1.07, and take all practicable steps to eliminate the exceedance. Subsequent visible emission surveys shall be conducted as indicated in item 2.a.i.

b. **PM**

The owner or operator shall calculate the amount of particulate emitted, on an hourly basis, to the ambient air, based on the calculated difference between abrasive agent used and agent disposed of, divided by the hours of actual operation.

3. Record Keeping (Regulation 2.16, section 4.1.9.2)

a. **Opacity**

Records of the results of all visible emission surveys and tests performed shall be maintained and shall include the date and time of the survey; the name of the person conducting the survey; and whether visible emissions were observed. If an Emission Point is not being operated during a given week (or month, as appropriate), then no visible emission survey needs to be performed and a negative declaration may be entered in the record.

b. **PM**

The owner or operator shall keep monthly records, of all abrasive agent used, all abrasive agent disposed of, and hours of facility operation.

4. Reporting (Regulation 2.16, section 4.1.9.3)

a. **Opacity**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for opacity:

- i. Emission Unit ID number and Stack ID number
 - ii. The beginning and ending date of the reporting period
 - iii. The date, time, and results of each Method 9 conducted
(or a negative declaration If none)
 - iv. Description of any corrective action taken pursuant to Additional Condition 2.a.iii.
- b. **PM**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for PM:

- i. Emission Unit ID Number
- ii. The beginning and ending date of the reporting period
- iii. The monthly and year to date total particulate emissions
- iv. Identification of all periods of exceedances of the standards including the quantity of excess emissions
- v. Description of any corrective action taken pursuant to 4.b.iv.

PERMIT SHIELD

The owner or operator is hereby granted a permit shield that shall apply as long as the owner or operator demonstrates ongoing compliance with all the conditions of this permit. Compliance with

the conditions of this permit shall be deemed compliance with all applicable requirements of the regulations cited in this permit as of the date of issuance per District Regulation 2.16, section 4.6.1.1.

The owner or operator requested that the Title V permit shield, granted under this permit, expressly state that the following federal NSPS regulations are not applicable to the source:

1. 40 CFR 60 subpart Cc
2. 40 CFR 60 subparts D, Da, Db and Dc
3. 40 CFR 60 subparts E, Ea and Eb
4. 40 CFR 60 subparts K, Ka and Kb
5. 40 CFR 60 subpart O
6. 40 CFR 60 subpart GG
7. 40 CFR 60 subpart OOO

The District reviewed the applicability of the listed NSPS regulations and agree that they do not apply to this source.

OFF-PERMIT DOCUMENT

TITLE
“Landfill Gas Collection and Control Plan”

DATE
30 May, 1997, rev. 15 December, 1997

ALTERNATIVE OPERATING SCENARIO

The company requested no alternative operating scenario in its Title V application.

SOURCE-WIDE HAP SPECIATION					
HAP	CAS #	HAP	CAS #	HAP	CAS #
Xylene	1330-20-7	Toluene	108-88-3	Chlorobenzene	108-90-7
Benzene	71-43-2	Ethyl benzene	100-41-4		

INSIGNIFICANT ACTIVITIES

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Description	Quantity	Basis
Internal combustion engines fixed or transportable	7	Reg 2.02, sec 2.2
Brazing, soldering or welding operation	2	Reg 2.02, sec 2.3.4
Dipping operations - coating objects with oils, waxes, or greases	1	Reg 2.02, sec 2.3.9.1
Portable diesel or gasoline storage tanks, less than 250 gal.	2	Reg 2.02, sec 2.3.23
Paved, non-paved haul roads/truck traffic	various	no regulatory basis
Composing Process	1	no regulatory basis
4.8 MMBtu Boiler	1	Reg 2.02, sec 2.1.1
Non-halogenated cold solvent parts cleaners - secondary reservoir*	various	Reg 2.02, sec 2.3.22

1. Insignificant Activities are only those activities or processes falling into the general categories defined in Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.
2. Activities identified In Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.
 - i. Non-halogenated cold solvent parts cleaners shall be operated in compliance with all applicable sections of Regulations 6.18 and 7.18, including Section 4 of each.
 - ii. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirements which shall include a 20% opacity limit for facilities not otherwise regulated.

- iii. No periodic monitoring shall be required for facilities designated as insignificant activities.